

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID WARD,

Plaintiff,

v.

TROOPER JAMES DUGHI, TROOPER
THOMAS BLAIR, SERGEANT JOHN
STROZYK, OFFICER JAMES HART,
et al.,

Defendants.

CIVIL ACTION NO. 3:CV:11-945

(JUDGE CAPUTO)

JURY VERDICT QUESTIONNAIRE

Please read this form carefully and complete it once you have decided on your verdict. Before any answer can be made to any of the questions listed below, all members of the jury must agree as to the answer.

- 1) Do you find that Trooper James Dughi, Sergeant John Strozyk or Officer Hart arrested Mr. Ward without probable cause in violation of Mr. Ward's Fourth Amendment rights?

Trooper James Dughi: Yes _____ No X

Sergeant John Strozyk: Yes _____ No X

Officer James Hart: Yes _____ No X

If you answered yes with regard to Trooper Dughi in question 1, please proceed to question 2.

If you answered no with regard to Trooper Dughi, regardless of your answers with regard to Sergeant Strozyk and Officer Hart, please proceed to question 3.

- 2) Do you find that Trooper James Dughi arrested Mr. Ward in retaliation for the exercise of Mr. Ward's First Amendment rights?

Trooper James Dughi: Yes _____ No _____

Please proceed to question 3.

- 3) Do you find that any of the Defendants listed below violated Mr. Ward's Fourth Amendment right to be free from the use of excessive force?

Trooper James Dughi: Yes _____ No X

Trooper Thomas Blair: Yes _____ No X

Sergeant John Strozyk: Yes _____ No X

Officer James Hart: Yes _____ No X

If you have answered no to as to all defendants, in question 1, question 2, and question 3, stop here, answer no further questions, and have the foreperson sign and date the end of this form.

If you have answered yes as to any defendants in question 1, question 2, or question 3, please proceed to question 4.

- 4) If you answered yes to any of the questions above, do you find that Mr. Ward suffered actual injury as a result of the violation of his constitutional rights?

Yes _____ No _____

If you answered yes to question 4, please proceed to question 5.

If you answered no to question 4, please proceed to question 9.

- 5) If you answered yes to question 1, question 2 or question 3 with regard to Trooper Dughi, please state the amount of damages that will fairly compensate Mr. Ward for the injuries he actually sustained as a result of Trooper Dughi's conduct.

Compensatory Damages: \$ _____

Please proceed to question 6.

- 6) If you answered yes to question 3 with regard to Trooper Blair, please state the amount of damages that will fairly compensate Mr. Ward for the injuries he actually sustained as a result of Trooper Blair's conduct.

Compensatory Damages: \$ _____

Please proceed to question 7.

- 7) If you answered yes to question 1 or question 3 with regard to Sergeant Strozyk, please state the amount of damages that will fairly compensate Mr. Ward for the injuries he actually sustained as a result of Sergeant Strozyk's conduct.

Compensatory Damages: \$ _____

Please proceed to question 8.

- 8) If you answered yes to question 1 or question 3 with regard to Officer Hart, please state the amount of damages that will fairly compensate Mr. Ward for the injuries he actually sustained as a result of Officer Hart's conduct.

Compensatory Damages: \$ _____

Please proceed to question 10.

- 9) Because you determined that Mr. Ward has not suffered an actual injury as a result of the violation of his rights, he is entitled to \$1.00 in nominal damages. Write \$1.00 in the spaces below.

Trooper James Dughi: \$ 1.00

Trooper Thomas Blair: \$ 1.00

Sergeant John Strozyk: \$ 1.00

Officer James Hart: : \$ 1.00

Please proceed to question 10.

- 10) If you answered yes on question 1, question 2 or question 3 with regard to Trooper Dughi, did Trooper Dughi act maliciously or wantonly in violating Mr. Ward's rights?

Trooper James Dughi: Yes _____ No _____

If you answered yes to in question 10, please proceed to question 11.

If you answered no in question 10, please proceed to question 12.

- 11) What amount of punitive damages, if any, is Mr. Ward entitled to recover from Trooper Dughi?

Punitive Damages

Trooper James Dughi: \$ _____

Please proceed to question 12.

- 12) If you answered yes on question 3 with regard to Trooper Blair, did Trooper Blair act maliciously or wantonly in violating Mr. Ward's rights?

Trooper Thomas Blair: Yes _____ No _____

If you answered yes to in question 12, please proceed to question 13.

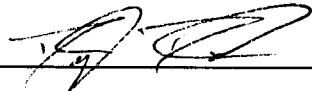
If you answered no in question 12, stop here, answer no further questions, and have the foreperson sign and date the end of this form.

- 13) What amount of punitive damages, if any, is Mr. Ward entitled to recover from that Trooper Blair?

Punitive Damages

Trooper Thomas Blair: \$ _____

Have the presiding juror sign and date this form.

Signature: 

Print: Dylan DeNite

Date: 5/11/16